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ATTORNEY FOR PLAINTIFF

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

TYLER BURNARD, et al. : Case No.: 6:22-CV-1982MC

Plaintiff,

: PLAINTIFFS' MOTION FOR
: TEMPORARY RESTRAINING

ORDER

v.

OREGON STATE HOSPITAL,
ADAM GIBLIN, Personally,
ET AL,

Defendants.

COMES NOW Plaintiffs Tyler Burnard, et al and respectfully move
for a Temporary

Restraining Order against Defendants Oregon State Hospital (OSH) and

the security

department from enforcing unconstitutional mailed packages, food, and gift policies to

reject any and all outside shipments and hand-deliveries and ordering Defendants to afford

Plaintiffs and all patients due process notice and an opportunity to challenge Defendants'

policies and decisions. In compliance with D. Or. LR 7-1 (a)(1)(A), the parties have made a

good faith effort through telephone conferences to resolve the dispute and have been unable

to do so. *See* Declaration of Leonard R. Berman.

Submitted in support of this Motion are Plaintiff's Legal Memorandum, Declaration of

Tyler Burnard, Declaration of Leonard Berman, Declarations of Jared Bowman and

Douglas Styles.

WHEREFORE, Plaintiffs Tyler Burnard, et al asks that the Court grants Plaintiffs'

Motion for Temporary Restraining Order.

DATED this 30th day of June, 2024.

Respectfully Submitted,

S//S Leonard R. Berman

Leonard Berman

OSB #96040

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Respectfully Submitted,

S//S Leonard R. Berman

Leonard Berman

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Attorney for Plaintiff (s)